I.   Introduction

In response to the Office Action dated September 10, 2007, the claims have not been amended. Claims 1-2, 4-9, 11-16, and 18-21 remain in the application. Re-examination and re-consideration of the application is requested.

II.   Prior Art Rejections

On page (2) of the Office Action, claims 1-21 were rejected under 35 U.S.C. §103(a) as being unpatentable over Kochevar, "The Tecate Data Space Exploration Utility," (Kochevar).

Applicants respectfully traverse these rejections.

Specifically, claims 1, 8, and 15 were rejected as follows:

> As per claim 1, Kochevar teaches the claimed "method of obtaining a map in a computer graphics program" comprising: "receiving a request for a map picture" (Kochevar, the MapQuery Tool; figure 3); "obtaining a map file" (Kochevar, section 5.1 Visualizing Data in a Database; pages 161-162; the displayed map in figure 6); "determining, from the map file, a uniform resource locator (URL) that identifies a storage location of map data, wherein the map data defines one or more map objects of the map picture" (Kochevar, figure 7). It is noted that Kochevar does not teach the map picture is "vector based" map picture. However, Kochevar's graphical images on the web pages or html.doc (section 5.2, page 162) contain several different formatted graphical objects including the "vector based" map picture as claimed. Thus, it would have been obvious to a person of ordinary skill in the art at the time the invention was made, to down load the map picture form the Internet WebPages in Kochevar's reference containing "vector based" map picture because of Kochevar's system ability to access to an unlimited number of graphical web sites where the "vector based" map picture is used.

> As per claim 8, Kochevar teaches the claimed "apparatus for obtaining a map computer-implemented graphics system" comprising: a computer (Kochevar, Abstract Visualization Machine; figure 1) and an application executing on the computer (Kochevar, page 159, section 2.2, Object Manager), wherein the application is configured to : "receiving a request for a map picture" (Kochevar, the MapQuery Tool; figure 3); "obtaining a map file" (Kochevar, section 5.1 Visualizing Data in a Database; pages 161-162); "determining, from the map file, a uniform resource locator (URL) that identifies a storage location of map data, wherein the map data defines one or more map objects of the map picture" (Kochevar, section 5.2, Browsing the World Wide Web; page 162); and "obtaining the map data from the location, wherein the obtained map data satisfies the request for the map picture" (Kochevar, figure 7). It is noted that Wolff does not teach the map picture is "vector based" map picture. However, Kochevar's graphical images on the web pages or html.doc (section 5.2, page 162) contain several different formatted graphical objects including the "vector based" map picture as claimed. Thus, it would have been obvious to a person of ordinary skill in the art at the time the invention was made, to down load the map picture from the Internet WebPages in Kochevar's reference containing "vector based" map picture because of Kochevar's system ability to access to an unlimited number of graphical web sites where the "vector based" map picture is used.

> As per claim 15, Kochevar teaches the claimed "article of manufacture embodying logic that causes a computer-implemented graphics system to obtain a map" wherein the logic comprises"

"receiving a request for a map picture" (Kochevar, the MapQuery Tool; figure 3); "obtaining a map file" (Kochevar, section 5.1 Visualizing Data in a Database; pages 161-162); "determining, from the map file, a uniform resource locator (URL) that identifies a storage location of map data, wherein the map data defines one or more map objects of the map picture" (Kochevar, section 5.2, Browsing the World Wide Web; page 162); and "obtaining the map data from the location, wherein the obtained map data satisfies the request for the map picture" (Kochevar, figure 7). It is noted that Kochevar does not teach the map picture is "vector based" map picture. However, Kochevar's graphical images on the web pages or html.doc (section 5.2, page 162) contain several different formatted graphical objects including the "vector based" map picture as claimed. Thus, it would have been obvious to a person of ordinary skill in the art at the time the invention was made, to down load the map picture from the Internet WebPages in Kochevar's reference containing "vector based" map picture because of Kochevar's system ability to access to an unlimited number of graphical web sites where the "vector based" map picture is used.

(1)   Kochevar does not teach, disclose or suggest obtaining a map file in response to a request for a map picture;

(2)   Kochevar does not teach, disclose or suggest determining from a map file, a URL that identifies a storage location;

(3)   Kochevar does not teach, disclose or suggest a URL that identifies a storage location of vector based map data;

(4)   Kochevar does not teach, disclose or suggest vector based map data that defines one or more map objects of a requested map picture; and

(5)   Kochevar does not teach, disclose or suggest displaying a map picture having vector based map data.

Independent claims 1, 8, and 15 are generally directed to maps in a computer graphics system. More specifically, a request for a map picture is received. Thereafter, a map file is obtained in response to the request. It is noted that the map file does not yet satisfy the request for the map picture. From the map file, a URL is determined that identifies a storage location of vector based map data. In addition, this vector based map data defines map objects of the map picture. The vector based map data is then obtained from the storage location at the determined URL. This vector based map data satisfies the request for the map picture. Lastly, the map picture is displayed.

The cited references do not teach nor suggest these various elements of Applicants' independent claims.

To reject the present claims based on Kochevar, one must attempt to map each of the claim elements to the teaching of Kochevar.

The first claim limitation provides for receiving a request for a map picture. In rejecting this claim element, the office Action relies on Kochevar's MapQuery Tool illustrated in Figure 3. Page 161 of Kochevar describes the MapQuery Tool:

> In the database world, the MapQuery Tool is provided so that graphical queries can be made for Earth science datasets whose geographical extents and timestamps fall within user-specified constraints. The tool is built around a world map upon which regions of interest can be specified (see Figure 3).

The second claim limitation provides for obtaining a map file in response to the request. This claim element is rejected based on "Kochevar, section 5.1 Visualizing Data in a Database; pages 161-162, the displayed map in figure 6)." Applicants respectfully disagree with and traverse the rejection of this claim limitation. As claimed, in response to a request for a map picture, a "map file" is obtained. To read on these claim limitations and consistent with the Examiner's interpretation of the first claim element, Kochevar must provide that in response to the user marking a region of interest, a map file is received. However, Kochevar fails to provide a map file in response to any such specification of a region of interest. Beginning with section 5.1 on page 161, once the user marks a region of interest, a query message is sent to a database interface and the result of the query is returned to the Mapquery Tool that forwards it to an Intelligent Visualization System, accompanied by a select task directive. Such language fails to obtain a map file in response to a request. Instead, a query result is returned. A query result is not a map file whatsoever. As claimed and as set forth in the specification, a map file is a "file". No such file is taught or suggested, explicitly or implicitly, anywhere in Kochevar.

Kochevar continues and states that the intelligent visualization system (IVS) is executed by BigRiver where a stream of AVL code is produced that is sent to an abstract visualization machine for interpretation. Again, such language fails to provide any file whatsoever. Instead, a script is produced and executed by Big River (which is a visualization programming system consisting of a collection of procedures referred to as modules [see page 160]) and a stream of AVL code is produced and sent to a machine for interpretation. Such a script and/or code stream is not equivalent to the claimed "map file" in any way, shape, or form. More specifically, as claimed, the map file is used to determine a URL that identifies a storage location of vector based map data. Neither Kochevar's script nor Kochevar's stream of AVL code can be used to determine a URL that identifies a storage location of vector based map data (or a storage location for anything).

-8-

Kochevar further recites that the AVL program creates a new virtual world consisting of a collection of 3-D icons that each correspond to a dataset that was returned as the result of the initial query. Again, neither the icons nor the data set are even remotely equivalent to a "map file" or any "file" whatsoever. Further, Kochevar states that each icon is an object whose physical appearance is a function of data-set type. Again, such an icon is not a file nor is it a URL.

In section 5.2, Kochevar provides that if an end-user chooses to browse the web, the default virtual world is supplanted by a new one that depicts a map of the Earth arrayed in 3-D. Further, select web sites are positioned in the world as 3-D icons as illustrated in Figure 6. Each icon is cloned from a single "hyperlink" prototype object that uses a state variable to store a URL.

The Office Action asserts that Kochevar's displayed map of figure 6 is equivalent to the map file. However, nowhere in figure 6 is the displayed map referred to as a file. Instead, as explicitly stated, figure 6 illustrates www sites depicted as 3D icons on a world map. Again, Kochevar explicitly provides that web sites are positioned in the world as 3-D icons as illustrated in Figure 6 where each icon is cloned from a single hyperlink prototype object that uses a state variable to store a URL (each web site icon inherits a behavior that causes a data file pointed to by its URL state variable to be fetched when the icon is picked). As can clearly be seen, the world map and icons of figure 6 are not even remotely similar to a map file as set forth in the claims.

Applicants further note that as expressly claimed, from the map file, a URL is determined that identifies a storage location of vector based map data. In addition, the vector based map data defines one or more map objects of the map picture (that was requested). It is simply impossible to read the world map and icons of Kochevar onto the map file that is retrieved in response to a request for a map picture wherein the map file has URLs for storage locations of vector based map data for map objects of the picture. There is not even a remote similarity, explicitly or implicitly, in Kochevar to such claim limitations.

With respect to the claim limitation relating to the URL identifying the storage location of map data that defines map objects of a map picture, the Office Action relies on Kochevar Section 5.2, Browsing the World Wide Web; page 162. As described above, Kochevar provides the ability to display a virtual world that may be visualized. As set forth, a map of the Earth is arrayed in 3D with web sites positioned as 3D icons in the map. Once an icon is selected, the home page for a web site is visualized based on an inverted pyramid whose apex is centered on the chosen icon. The text and

imagery for the home page is displayed as illustrated in Figure 7. As can be clearly seen, rather than displaying a map having map objects and vector based map data, Kochevar is utilized to display a virtual world for browsing the web wherein web sites are actually displayed within a pyramid on the map. Such a teaching is not even remotely applicable or similar to the presently claimed invention in any way, shape, or form.

Again, nowhere in Kochevar is there any type of map file that is retrieved in response to a request for a map picture. Further, as claimed, the map file contains particular and specific elements including a URL that identifies a storage location of vector based map data that defines objects for the request map picture. Nowhere is such a location for a map object even remotely hinted at in Kochevar.

The Office Action admits that Kochevar fails to teach the map picture is "vector based" map picture. Without teaching such a claim limitation, it is impossible for Kochevar to teach or render obvious the presently claimed invention that is specifically directed towards and expressly claims vector based map data that defines map objects.

The Office Action asserts that Kochevar's graphical images on the web pages or html.doc contain several different formatted graphical objects including the vector based map picture as claimed. Applicants respectfully disagree with and traverse such an assertion. Nowhere in Kochevar is there even a remote hint that Kochevar's graphical images on web pages are vector based map objects. To the contrary, Kochevar expressly teaches that an inverted pyramid is displayed with an apex having an icon and text and imagery for the home page is displayed within the pyramid (see Figure 7). Such a teaching does not teach, disclose, suggest, or hint at vector based map data whatsoever.

Further, not only do the claims require vector based map data, but the vector based map data must define map objects of the map picture. The only map displayed in Kochevar is a map of the Earth arrayed in 3D with icons for different websites. Such icons are not vector based map objects or vector based map data whatsoever. Again, one must attempt to map Kochevar's claim elements consistently and such a mapping cannot be done with respect to the presently claimed invention.

Lastly, the claims explicitly provide for retrieving the vector based map data from the identified storage location at the URL and displaying the resulting map picture. Thus, the claims

-10-

provide for displaying a vector based map having vector based map objects. Such a teaching is completely and wholly lacking from Kochevar.

The Office Action alleges that a map can be represented by a raster database, vector database, graphics/object database, and that there is no thing new in a displayed map in computer provided by a vector database. Applicants respectfully disagree. Raster based map data may be retrieved as a large file and is cumbersome. Significant advantages arise when using vector based map data. Further, the present invention provides a unique, novel, and nonobvious mechanism for retrieving and displaying a vector based map picture. Such a teaching is lacking from the cited art.

The Office Action lastly concludes:

> Kochevar also mentions that the type of database linked to the icons on the map can be any well known type of database for representing graphics in a user interface which clearly include the vector database representing a graphics object (e.g., 2D city map of NY city) within a map of the United States of America on display (page 157, column 1, 1st paragraph in section Introduction.

Applicants respectfully disagree with and traverse such assertions. Namely, as admitted in such a section, the icons are linked to a database. The present claims do not provide for linking to a database whatsoever. Instead, from a map file, URLS that identify a storage location of vector based map data is determined. No database or icons linked to databases are even remotely described. Further, icons linked to a database are not relevant to determining a storage location of vector based map data. Further, the Patent Office is presuming that a 2D city map of NY city within a map of the USA is a vector based map. Consistent with the prior art, such a map is likely to be a raster map and not a vector map.

In view of the above, Applicants submit that not only does Kochevar fail to teach numerous aspects of the claimed invention but it is completely illogical to apply Kochevar's teaching to the present limitations. Kochevar's teaching cannot be mapped to the present claims and does not even remotely address the claim limitations.

Moreover, the various elements of Applicants' claimed invention together provide operational advantages over Kochevar. In addition, Applicants' invention solves problems not recognized by Kochevar.

Thus, Applicants submit that independent claims 1, 8, and 15 are allowable over Kochevar. Further, dependent claims 2, 4-7, 9, 11-14, 16, and 18-21 are submitted to be allowable over Kochevar in the same manner, because they are dependent on independent claims 1, 8, and 15,

respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2, 4-7, 9, 11-14, 16, and 18-21 recite additional novel elements not shown by Kochevar.

III.   Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

GATES & COOPER LLP
Attorneys for Applicant(s)

Howard Hughes Center
6701 Center Drive West, Suite 1050
Los Angeles, California 90045
(310) 641-8797

Date: January 10, 2008

By:/Jason S. Feldmar/
Name: Jason S. Feldmar
            Reg. No.: 39,187

JSF/sjm

G&C 30566.17-US-C3

-12-